

EXHIBIT A

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ROBERT B. LINDER, ESQ. 026251988
Attorney-At-Law
2 North Dean Street, Suite 206
Englewood, New Jersey 07631
(201) 894-1800
Attorney for Plaintiff(s)

FILED
CUSTOMER SERVICE

NOV 09 2016

SUPERIOR COURT OF NEW JERSEY
COUNTY OF HUDSON
CIVIL DIVISION #2

MARITZA RODRIGUEZ,

Plaintiff(s),

: **SUPERIOR COURT OF NEW JERSEY**
: **LAW DIVISION: HUDSON COUNTY**
: **DOCKET NO.:**

L-443716

v.

WALMART, WALMART, INC.,
WAL-MART STORES, INC., WAL-
MART STORES EAST, INC., WAL-
MART STORES EAST I, LP, WAL-
MART PROPERTIES, INC., WAL-
MART REALTY CO., WALMART
SUPERCENTER OF NORTH
BERGEN STORE #3795, JOHN DOE
1-10, JOHN DOE, INC, 1-10, and the
ABC CORPORATION 1-10, the latter
names being fictitious, the true
identities being presently unknown,
JANE DOE 1-10, JANE DOE, INC. 1-
10, and the DEF CORPORATION 1-
10, the latter names being fictitious, the
true identities being presently unknown,

Defendant(s).

Civil Action

COMPLAINT
PLAINTIFF DEMANDS
JURY TRIAL, DEMAND FOR
INTERROGATORIES, DEMAND FOR
INSURANCE COVERAGE, DEMAND
FOR DOCUMENTS, DESIGNATION
OF TRIAL COUNSEL

Plaintiff, Maritza Rodriguez residing at 5701 Kennedy
Boulevard East, West New York, New Jersey complains of the
Defendants and says:

FIRST COUNT

1. On or about December 10, 2014, Plaintiff, Maritza Rodriguez was lawfully on the premises of a Walmart Supercenter store number 3795 located at 2100 88th Street, North Bergen, New Jersey (hereinafter referred to as "subject property").
2. On or about December 10, 2014, Defendant, Walmart owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property.
3. On or about December 10, 2014, Defendant, Walmart, Inc. owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property.
4. On or about December 10, 2014, Defendant, Wal-Mart Stores, Inc. owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property.
5. On or about December 10, 2014, Defendant, Wal-Mart Stores East, Inc. owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property.
6. On or about December 10, 2014, Defendant, Wal-Mart Stores East I, LP owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property.

7. On or about December 10, 2014, Defendant, Wal-Mart Properties, Inc. owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property.
8. On or about December 10, 2014, Defendant, Wal-Mart Realty Company owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property.
On or about December 10, 2014, Defendant, Walmart Supercenter of North Bergen Store #3795 owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property.
10. On or about December 10, 2014, the Defendants, John Doe 1-10, John Doe, Inc. 1-10, and the ABC Corporation 1-10, the latter names being fictitious, the true identities being presently unknown, owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property and/or were responsible for the care, custody, control, supervision, cleaning, servicing, and maintenance of the subject property by contract express or implied.
11. The Defendants jointly and/or severally owned, operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property in a negligent, careless, reckless and inattentive manner so as to cause, permit, or allow a dangerous and hazardous floor condition to

exist at the subject property.

12. As a result of the negligence of the Defendants as aforesaid, the Plaintiff, Maritza Rodriguez sustained serious personal injuries which caused and will cause in the future permanent disability, disfigurement, loss of bodily function, medical and other expenses, loss of income and reduced earning capacity, pain and suffering, interference with Plaintiff's ability to engage in active pursuits and an impairment of the quality of life.

WHEREFORE, Plaintiff, Maritza Rodriguez demands judgment on the First Count against the Defendants jointly and/or severally for damages, interest and cost of suit.

SECOND COUNT

1. The allegations of the FIRST COUNT are repeated as if realleged in full.
2. On or about December 10, 2014, Defendant, Jane Doe 1-10, Defendant, Jane Doe Inc. 1-10, and Defendant, DEF Corporation 1-10 the latter names being fictitious, the true identities being presently unknown individuals, companies, corporations, and/or their respective servants, agents, employees and/or independent contractors who were responsible for performing the cleaning, servicing, and/or maintaining of the floors for the subject property.

3. The Defendants jointly and/or severally operated, supervised, controlled, managed, cleaned, serviced, and maintained the subject property in a negligent, careless, reckless and inattentive manner so as to cause, permit, or allow a dangerous and hazardous floor condition to exist at the subject property.
4. As a result of the negligence of the Defendants as foresaid, the Plaintiff, Maritza Rodriguez sustained serious personal injuries which caused and will cause in the future permanent disability, disfigurement, loss of bodily function, medical and other expenses, loss of income and reduced earning capacity, pain and suffering, interference with Plaintiff's ability to engage in active pursuits and an impairment of the quality of life.

WHEREFORE, Plaintiff, Maritza Rodriguez demands judgment on the Second Count against the Defendants jointly and/or severally for damages, interest and cost of suit.

ROBERT B. LINDER
Attorney for Plaintiff


ROBERT B. LINDER

Dated: November 1, 2016

DEMAND FOR INTERROGATORIES

Plaintiff demands that each Defendant answer Form C and C
(2) Interrogatories as set forth in the Rules of Court.

DEMAND FOR INSURANCE COVERAGE

In accordance with R.4:10-2, plaintiff demands that each
defendant provide a complete copy of his/her applicable
liability insurance policies including any excess or umbrella
policies with declaration sheets within thirty (30) days of
service of this Complaint.

DEMAND FOR DOCUMENTS

Plaintiff demands that each defendant, within thirty (30)
days of service of this Complaint, each produce copies of
their complete files regarding the accident.

JURY DEMAND

Pursuant to Rule 4:35-1, the Plaintiff hereby demands a
trial by jury on all issues.

ROBERT B. LINDER
Attorney for Plaintiff


ROBERT B. LINDER

Dated: November 1, 2016

DESIGNATION OF TRIAL COUNSEL

Pursuant to R.4:25-4, James M. Pocchia, Esq. is hereby designated as Trial Counsel of this matter.

ROBERT B. LINDER
Attorney for Plaintiff



ROBERT B. LINDER

CERTIFICATION OF COUNSEL

Pursuant to Rule 4:5-1, the Plaintiff hereby certifies that the matter in controversy is not the subject of any other related action.



ROBERT B. LINDER

Dated: November 1, 2016.

JAMES M. POCCHIA, ESQ. 045571991
ROBERT B. LINDER, ESQ. 026251988
 Attorney-At-Law
 2 North Dean Street, Suite 206
 Englewood, New Jersey 07631
 (201) 894-1800
 Attorney for Plaintiff(s)

MARITZA RODRIGUEZ, : SUPERIOR COURT OF NEW JERSEY
 : LAW DIVISION: HUDSON COUNTY
 : DOCKET NO.: HUD-L-4437-16

Plaintiff(s),

v. :

WALMART, WALMART, INC., :

Civil Action

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 BERGEN STORE #3795, JOHN DOE :
 1-10, JOHN DOE, INC, 1-10, and the :
 ABC CORPORATION 1-10, the latter :
 names being fictitious, the true :
 identities being presently unknown, :
 JANE DOE 1-10, JANE DOE, INC. 1- :
 10, and the DEF CORPORATION 1- :
 10, the latter names being fictitious, the :
 true identities being presently unknown, :

SUMMONS TO
WAL-MART STORES, INC.

Defendant(s).

The State of New Jersey, to the Defendant(s) named above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed

above and online at http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf.)

If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, New Jersey 08625-0971.

A filing fee payable to the Treasurer of the State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of this judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at:

http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf.

Michelle M. Smith

Michelle M. Smith
Clerk of the Superior Court

Dated: November 30, 2016

Name of the Defendant to Be Served: WAL-MART STORES, INC.

Address of Defendant to Be Served: registered agent
The Corporation Trust Company
820 Bear Tavern Road
West Trenton, New Jersey 08628